

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|---------------------------|---|-------------------------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO.: 1:23-cr-00462 |
| |) | |
| Plaintiff, |) | JUDGE BENITA Y. PEARSON |
| |) | |
| vs. |) | |
| |) | |
| TERREZ WILSON, |) | <u>DEFENDANT'S MOTION FOR BOND</u> |
| |) | <u>PENDING SENTENCING</u> |
| Defendant. |) | |
| |) | |

Now comes the Defendant Terrez Wilson, by and through his undersigned counsel Marisa L. Serrat, and hereby respectfully moves this Honorable Court to release Mr. Wilson on bond pending sentencing, with any conditions deemed appropriate by this Court. Mr. Wilson previously waived his right to a detention hearing and respectfully requests this Honorable Court to reopen his detention proceeding to consider releasing him on bond pending sentencing pursuant to 18 U.S.C. § 3143. A more thorough explanation of this request is set forth in the attached Memorandum in Support, incorporated herein by reference.

Respectfully Submitted,

s/ Marisa L. Serrat
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MEMORANDUM IN SUPPORT

I. PROCEDURAL HISTORY.

On August 23, 2023, Terrez Wilson was named in 3-Counts of a 14-Count Indictment filed in the United States District Court for the Northern District of Ohio. (Indictment, R. 1). On December 4, 2023, the government filed a Motion for Writ of Habeas Corpus ad prosequendum requesting that Mr. Wilson be brought from Cuyahoga County Jail to federal custody for his arraignment. Terrez Wilson appeared before Honorable Magistrate Judge Grimes of his arraignment on December 5, 2023 and was ordered temporarily detained. On December 6, 2023, Mr. Wilson executed a waiver of his detention hearing, reserving the right to raise the issue of detention at a later date. (Waiver, R. 67, PID 285).

It is anticipated that Mr. Wilson will enter a plea of guilty on June 20, 2024 pursuant to a written plea agreement. (Notice, R. 101, PID 441).

II. LAW AND ARGUMENT.

In accordance with 18 U.S.C. § 3142 and 18 U.S.C. § 3143, the defense respectfully requests this Honorable Court to review the record to determine whether there are any conditions or combinations of conditions of release that would reasonably assure the appearance of Mr. Wilson at further court proceedings and protect the public.

Terrez Wilson is twenty (20) years old. He has strong ties to the community, including the support of his mother, Ms. Wilson. His mother has indicated that if Mr. Wilson were to be released on bond, he would be able to return home to reside with her. She has indicated to counsel that she does not have any firearms, illegal substances, or other hazards in the home. In addition, she will do everything she can to assist Mr. Wilson with obtaining employment to support himself and his young child, while also working towards obtaining his GED. Mr. Wilson has a four-month-old

child that was born while he was incarcerated. It has been very difficult to not be there for these crucial moments in his first child's life. This has had a strong impact on Mr. Wilson and his desire to have a successful future outside of the criminal justice system. Mr. Wilson has been in pretrial detention for approximately six and half months. Mr. Wilson has not had any disciplinary infractions while in pretrial detention. He was enrolled in GED classes in Cuyahoga County Jail and also completed approximately thirty (30) rehabilitation-based programs while at Mahoning County Jail.

Counsel has reviewed the standard conditions of release with Mr. Wilson. Mr. Wilson further agrees to GPS location monitoring if this Court finds it to be an appropriate condition of his release. Mr. Wilson understands that he must strictly comply with all conditions ordered by this Court if he were to be released pending sentencing. Based upon the foregoing, the defense argues that there are conditions of release that will reasonably assure the appearance of Mr. Wilson and ensure the safety of any other person and the community.

III. CONCLUSION.

Wherefore, Terrez Wilson respectfully requests this Honorable Court to grant his release on bond pending sentencing with any conditions deemed appropriate and necessary by the Court.

Respectfully Submitted,

s/ Marisa L. Serrat
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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2024, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.
Parties may access this filing through the Court's system.

Respectfully Submitted,

s/ Marisa L. Serrat
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